

DANIEL G. BOGDEN
United States Attorney
District of Nevada
ANDREW W. DUNCAN
CRISTINA D. SILVA
Assistant United States Attorneys
333 Las Vegas Boulevard South
Suite 5000
Las Vegas, Nevada 89101
702-388-6336

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

-oOo-

UNITED STATES OF AMERICA,)	
)	Case No.: 2:13-cr-00250-JAD-VCF
Plaintiff,)	
)	STIPULATION TO CONTINUE
vs.)	EVIDENTIARY HEARING (First Request)
)	(Doc. #170)
ROBERT KANE, et al.,)	
)	
Defendant.)	

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney; Andrew W. Duncan and Cristina Silva, Assistant United States Attorneys, counsel for the United States of America, and Assistant Federal Public Defender Raquel Lazo, counsel for defendant Carr; C. Stanley Hunterton, Esq. counsel for defendant Coleman; Michael R. Pandullo, Esq., counsel for defendant Panter; Brent Percival, Esq., counsel for defendant Congero, Thomas Pitaro, Esq., counsel for defendant Kane; and Terrence M. Jackson, Esq., counsel for defendant McNamara:

THAT THE EVIDENTIARY HEARING CURRENTLY SCHEDULED FOR July 8, 2015 be vacated and set to a time convenient for the Court, no earlier than 45 days.

1. Counsel for Government recently extended a plea offer to all the defendants.

1 Additional time is needed for counsel for the Defendants to convey the offer. If the new plea
2 offer is accepted, it will alleviate the need to hold the evidentiary hearing and a trial.

3 2. The parties agree to the continuance.

4 3. All of the defendants are out of custody and do not object to the continuance.

5 4. Additionally, denial of this request for continuance could result in a miscarriage
6 of justice.

7 5. This is the first request for continue the evidentiary hearing.

8
9 DATED this 6th day of July, 2015.

10 DANIEL G. BOGDEN
United States Attorney

11 /s/
12 ANDREW W. DUNCAN
CRISTINA D. SILVA
Assistant United States Attorney

13 /s/
14 C. STANLEY HUNTERTON, ESQ.
Counsel for Defendant Coleman

15 /s/
RAQUEL LAZO, ESQ.
Assistant Federal Public Defender
Counsel for Defendant Carr

16 /s/
17 MICHAEL PANDULLO, ESQ.
Counsel for Defendant Panter

18 /s/
BRENT PERCIVAL, ESQ.
Counsel for Defendant Congero

19 /s/
20 THOMAS PITARO, ESQ.
Counsel for Defendant Kane

21 /s/
TERRENCE JACKSON, ESQ.
Counsel for Defendant McNamara

-oOo-

Defendant.

ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Counsel for Government recently extended a plea offer to all the defendants. Additional time is needed for counsel for the Defendants to convey the offer. If the new plea offer is accepted, it will alleviate the need to hold the evidentiary hearing and a trial.
2. The parties agree to the continuance.
3. All of the defendants are out of custody and do not object to the continuance.
4. Additionally, denial of this request for continuance could result in a miscarriage of justice.
5. This is the first request for continue the evidentiary hearing.

For all of the above-stated reasons, the end of justice would best be served by a continuation of the evidentiary hearing.

...

ORDER

IT IS ORDERED that the evidentiary hearing (Doc. #170) scheduled for July 8, 2015 be vacated and continued to Thursday, September 10, 2015, at 9:00 a.m.

DATED this 7th day of July, 2015.



HONORABLE JENNIFER A. DORSEY
UNITED STATES DISTRICT JUDGE